

CASE NO.: 2:21-cv-00832-ACA

**ALABAMA DEPARTMENT OF
CORRECTIONS D/B/A WILLIAM
DONALDSON CORRECTIONAL
FACILITY AND LT. EDDIE
WATTS, AN INDIVIDUAL,

DEFENDANTS.**

1. Plaintiff propounded discovery upon Defendants on or about February 23, 2022, with Defendant Watts' initial responses sent March 23, 2022, with a supplemental response the next day. Defendant ADOC submitted its responses on or about May 16, 2022.

2. Counsel for Defendant Watts was under the belief that discovery has been propounded upon Plaintiff. Defendant Watts determined that this was false and immediately propounded discovery, which was July 12, 2022.

3. The parties have exchanged written discovery and are currently working on gathering the proper documents with respect to written discovery. The parties are also working to resolve any outstanding issues with the discovery responses without bothering the court with Motions to Compel.

4. Once that written discovery is complete the parties can schedule depositions in this matter. Defendants anticipate needing to depose the Plaintiff and other current and former Defendant ADOC staff, and other individuals that have been identified to have information, and Plaintiff anticipates needing to depose Defendant ADOC (30)(b)(6), multiple employees and/or former employees of Defendant ADOC, and Defendant Watts.

5. Primary counsel for Defendant ADOC is retiring effective August 1, 2022, and co-counsel and/or additional counsel will need the opportunity to properly prepare for defense of this case.

6. Based on the foregoing, the parties jointly request that the Court extend all deadlines by 90 days including the current August 1, 2022, discovery deadline to October 30, 2022, to allow the parties adequate time to complete discovery,

depositions, and the continuation to resolve any discovery disputes that may arise during the course of the depositions.

7. The parties further request that the October 17, 2022, dispositive motion deadline to November 29, 2022, and request that the other remaining outstanding Court deadlines be extended accordingly.

8. The parties acknowledge that such an extension may require that the trial of this matter be moved to the Court's next available trial calendar. The parties do not object to trial being moved to the Court's next available trial calendar.

9. The extension of the discovery, dispositive motion, and other deadlines will not prejudice Plaintiffs or Defendant and will further the interest of justice by allowing the parties to fully complete discovery in this matter.

10. This is the first requested discovery extension in this matter.

WHEREFORE, the parties respectfully request that this Honorable Court grant the parties' Joint Motion to Extend Unexpired Deadlines by extending the discovery deadline by 90 days, from the August 1, 2022, to October 30, 2022, the dispositive motion deadline from October 17, 2022, to November 29, 2022, and any remaining outstanding Court deadlines accordingly.

Submitted this 25th day of July, 2022.

COUNSEL FOR PLAINTIFFS:

/s/ Nicole D. Edwards

/s/ Blake C. Edwards

Edwards & Edwards Attorneys
and Mediators, PLLC
3603 Pine Lane Se, Suite C
Bessemer, AL 35022
Tel: (205) 549-1379
Fax: (205) 719-4033
Email: nicole@edwardsattys.com
blake@edwardsattys.com

COUNSEL FOR DEFENDANTS:

/s/ Bart G. Harmon, Esq.

/s/ Thomas M. McCarthy, Esq.

Attorneys for Alabama Department of Corrections
P.O. Box 301501
Montgomery, Alabama 36130
Tel: (334) 353-3881
Email: bart.harmon@doc.alabama.gov
thomas.mccarthy@doc.alabama.gov

/s/ Tara S. Hetzel

Peggy Rossmanith, Esq.
Andrew C. Crowder
Attorneys for Eddie Watts
OFFICE OF THE ATTORNEY GENERAL
GENERAL CIVIL LITIGATION DIVISION
501 Washington Avenue
P.O. Box 300152
Montgomery, Alabama 36130
[Tel:334-242-7300](tel:334-242-7300)
Email: tara.hetzel@alabamaag.gov
peggy.rossmanith@alabamaag.gov
andy.crowder@alabamaag.gov